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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendant.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF
HALLEY JOSEPHS IN SUPPORT OF
DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO, LLC'S RESPONSE
TO WAYMO'S OFFER OF PROOF
RE DEVELOPMENT EXPENSES**

Judge: The Honorable William Alsup

Trial Date: February 5, 2018

1 I, Halley Josephs, declare as follows:

2 1. I am an associate with the law firm of Susman Godfrey LLP. I am a member in
3 good standing of the Bar of the State of New York. I make this declaration based on personal
4 knowledge and, if called as a witness, I could and would testify competently to the matters set
5 forth herein. I make this declaration in support of Defendants Uber Technologies, Inc. and
6 Ottomotto LLC's Response to Waymo's Offer of Proof Re Development Expenses.

7 2. Attached as **Exhibit 1** are relevant pages from the 30(b)(6) deposition of Aslan
8 (Shawn) Bananzadeh, taken on August 24, 2017.

9 3. Attached as **Exhibit 2** are relevant pages from the deposition of John Bares, taken
10 June 16, 2017.

11 4. Attached as **Exhibit 3** is a true and correct copy of a presentation that was
12 produced bearing Bates numbers WAYMO-UBER00043124 to WAYMO-UBER00043148,
13 which has been marked as Trial Exhibit 1546.

14 5. Attached as **Exhibit 4** are relevant pages from the 30(b)(6) deposition of
15 Pierre-Yves Droz, taken on August 3, 2017.

16
17 I declare under penalty of perjury that the foregoing is true and correct. Executed this
18 28th day of January, 2018, at San Francisco, California.

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20 /s/ Halley Josephs
21 Halley Josephs
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ATTESTATION OF E-FILED SIGNATURE

I, Michael A. Jacobs am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Halley Josephs has concurred in this filing.

Dated: January 28, 2018

/s/ Michael A. Jacobs

MICHAEL A. JACOBS